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11 Evander Frank Kane

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**

15 In re

16 EVANDER FRANK KANE,

17 Debtor.

Case No. 21-50028-SLJ
Chapter 7

**DEBTOR'S EVIDENTIARY
OBJECTIONS TO DECLARATION OF
ANDREW J. GHEKAS IN SUPPORT OF
CENTENNIAL BANK'S MOTION TO
DISMISS LIQUIDATION**

Date: May 18, 2021
Time: 2:00 p.m.
Via Zoom

18 Debtor Evander F. Kane hereby makes the following evidentiary objections to the
19 Declaration of Andrew J. Ghekas in Support of Centennial Bank's Motion to Dismiss
20 Liquidation (ECF 99).

21 1. Debtor objects to paragraph 3, 4, 7, 8, and 9 as a summary that misstates the
22 testimony of the Debtor. The declaration should simply have attached the relevant portions of
23 the transcript rather than summarizing the testimony.

24 2. Debtor objects to paragraphs 3, 4, 6, 8, 9 and 10 as statements that are
25 argumentative as opposed to presentations of fact.

26 Debtor requests the Court grant the objections and strike the foregoing portions of the
27 Declaration from the record.
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2 Dated May 4, 2021

FINESTONE HAYES LLP

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4 /s/ Stephen D. Finestone

5 Stephen D. Finestone
6 Attorneys for Debtor
7 Evander F. Kane
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